

**IN THE UNITED STATES DISTRICT COURT
OF THE NORTHER DISTRICT OF ILLINOIS
EASTERN DIVISION**

NHC LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2019 C 6332
)	
CENTAUR CONSTRUCTION COMPANY, et al.,)	Judge Matthew Kennelly
Defendants.)	
)	

**NHC LLC’S MOTION FOR TURNOVER ORDER AS TO
WAGES FOR PETER ALEXOPOULOS**

NHC LLC, Plaintiff and Judgment Creditor, through its undersigned counsel, moves this court for a Turnover Order as to Wages for Defendant Peter Alexopoulos from Estia Construction LLC, William Alexopoulos, and Sportsman’s Resource Training LLC and in further support of its Motion NHC LLC states as follows:

1. After a jury trial that concluded on August 18, 2022 and months of post-trial motions, on March 15, 2023, judgment was entered against defendants Centaur Construction Co., Spiros Tsaparas, and Peter Alexopoulos jointly and severally in the total amount of \$22,272,124.34 for fraud and breach of contract plus punitive damages against the Defendants individually and in particular Alexopoulos in the amount of \$400,000.00 (“Judgment”).

2. Fed. R. Civ. P. 69. (“Rule 69”) incorporates into federal law state post-judgment enforcement procedures. The incorporated state procedures in this district are Section 2-1402 of the Illinois Code of Civil Procedure (735 ILCS 5/2-1402) and Illinois Supreme Court Rule 277, the state statutes and rules governing supplementary procedures. Thus, included within Rule 69 is the Court’s authority to enter orders in these supplemental citation proceedings to discover assets to apply to the Judgment. *See, GE Betz, Inc. v. Zee Co.*, 718 F.3d 615 (7th Cir.2013).

3. On May 11, 2023, NHC LLC served a citation to discover assets on William Alexopoulos, Peter Alexopoulos' father (Doc. No.241).

4. On May 19, 2023, NHC LLC served a citation to discover assets on Peter Alexopoulos (Doc. Nos. 245)

5. According to his Financial Affidavit, Peter Alexopoulos is the 100% owner or sole member of Sportsman's Resource Training, LLC and the Illinois Secretary of State lists him as the sole manager.

6. On October 18, 2023, NHC LLC served citation to discover assets on Estia Construction LLC (Doc. Nos. 281).

7. Peter Alexopoulos states on his Financial Affidavit signed October 25, 2023 that his monthly gross income is from the following "employers" and in the following amounts:

- a. Estia Construction LLC \$2600;
- b. Sportsman's Resource Training, LLC "when funds allow"; and
- c. William Alexopoulos, "approx. \$500-\$600"

8. Under federal law, the amount of wages that maybe applied toward a judgment is limited to the lesser of (i) 25% of disposable earnings for a week or (ii) the amount by which disposable earnings for a week exceed 30 times the federal minimum hourly wage (currently \$7.25 per hour). 735 ILCS 5/2-1402 and 15 U.S.C. 1673. As such Plaintiff is entitle to a Turnover Order /Wage Deduction Order on all non-exempt wages of Peter Alexopoulos from the date of service on him with respect to wages earned from the above "employers". Although requested, Peter Alexopoulos has not provided documents disclosing the monthly amounts paid by the above "employers".

9. Plaintiff remains open to working with counsel for Defendants and Third-Party

Respondents for agreed orders on exemptions, and turnover orders and wage deduction orders.

Plaintiff can provide the Court with a proposed order if requested.

Wherefore, the Plaintiff/Judgment Creditor NHC LLC requests this court to:

- a) Enter an order compelling Defendant Peter Alexopoulos to disclose the amounts paid weekly or monthly by the above “employers” and otherwise comply with the supplement proceedings;
- b) Enter a separate Turnover Order/Wage Deduction Order against Peter Alexopoulos and Estia Construction LLC, Sportsman’s Resource Training, LLC and William Alexopoulos in the amount of 25% of Defendant Peter Alexopoulos’ wages from May, 19, 2023 through October 31, 2023 to be paid immediately;
- c) Enter a separate Turnover Order/Wage Deduction Order against Peter Alexopoulos and Estia Construction LLC, Sportsman’s Resource Training, LLC and William Alexopoulos in the periodic monthly sum as referenced in paragraph number b) above for each pay period in favor of Defendant Peter Alexopoulos for the use of Plaintiff and have the separate Turnover Order/Wage Deduction Orders continue in effect until the balance of the judgment against Defendant Peter Alexopoulos, plus interest and costs are paid in full and
- d) Grant any other relief the circumstances may require.

Respectfully submitted,

NHC LLC, Plaintiff

By: /s/ Gini S. Marziani.
One of the attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that, on November 2, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system and thereby served electronically by the CM/ECF system on all counsel of record. As to Estia Construction LLC, a copy was mailed on November 2, 2023.

/s/ Gini S. Marziani
An Attorney for NHC LLC